

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

IN RE:	:	CHAPTER 13
	:	
VIVIAN ANN SNEAD	:	Case No. 17-11843-pmm
Debtor	:	
	:	

Date of Hearing: May 20, 2021
Time of Hearing: 11:00 a.m.

Location: U.S. Bankruptcy Court
The Gateway Building
201 Penn Street, 4th Floor
Reading, PA 19601

DEBTOR'S MOTION TO SELL REAL PROPERTY

NOW COMES, Debtor, VIVIAN ANN SNEAD, by and through her undersigned counsel, Zachary Zawarski, Esquire, hereby moves the Court for an Order to sell real property pursuant to the terms and conditions described herein.

1. On March 16, 2017, Debtor filed a voluntary bankruptcy petition under Chapter 13 of the Bankruptcy Code.
2. Debtor is the owner of the property located at 2930 Shakespeare Road, Bethlehem, PA 18017 (hereinafter the "Property").
3. There is a Mortgage on the property held by Nationstar Mortgage, LLC with an estimated outstanding principal balance of \$143,000.00.
4. Debtor recently decided to sell the Property.
5. Debtor engaged the services of a Broker/Realtor to sell the Property.

6. Debtor hired Keller Williams Real Estate and Kimberly D. Rosado as her Broker/Realtor.

7. On April 13, 2021, Debtor entered into an Agreement of Sale for the Property with Buyers, Wilfredo Colon and Evlyn Colon. A true and correct copy of the Agreement of Sale is attached hereto as Exhibit "A".

8. Debtor and the Buyers are not related to each other by blood, marriage, or business association.

9. The Sales Price of the Property is \$284,900.00.

10. The Settlement Date is currently July 13, 2021.

11. Pride Abstract and Settlement Services, LLC has been chosen by the parties as the Settlement Agent/Escrow Agent.

12. The contact information for Pride Abstract and Settlement Services, LLC is as follows:

Pride Abstract and Settlement Services, LLC
236 South Main Street
Coopersburg, PA 18036
Phone: (610) 266-6057

13. Pride Abstract and Settlement Services, LLC prepared an estimated Settlement Statement (HUD-1). A true and correct copy of the estimated Settlement Statement (HUD-1) is attached hereto as Exhibit "B".

14. All taxes and liens shall be paid at the Settlement.

15. The sale proposes to pay a real estate commission of four-and-a-half percent (4.50%) in the total amount of \$12,820.50 to be split among the Seller's Broker and Buyer's Broker.

16. Other costs and expenses related to the sale are itemized in the estimated HUD-1 and are incorporated herein by reference.

17. Pride Abstract and Settlement Services, LLC estimates that Debtor will receive total net proceeds from the sale in the amount of \$127,145.25.

18. The balanced owed to repay creditors in full is \$45,255.07.

19. The balanced owed to repay creditors along with the Trustee's commission of ten percent (10.00%) is \$49,865.48.

20. After the Closing and upon the Trustee's approval of the HUD-1, Debtor proposes that Pride Abstract and Settlement Services, LLC be directed to pay to the Chapter 13 Trustee the total sum of \$49,865.48 and be authorized to release the remaining sales proceed directly to the Debtor.

21. Debtor agrees to provide the Chapter 13 Trustee with a copy of the final HUD-1 immediately following the closing for the Trustee's approval before any funds are disbursed to Debtor and the Brokers as a condition to the approval of this motion.

WHEREFORE, Debtor respectfully requests that this Honorable Court approve the sale of real property and enter the order attached hereto.

Date: May 5, 2021

By: /s/ Zachary Zawarski
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